

November 11, 2020

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

***RE: Draft Notice of Proposed Rule Making in ET Docket No.19-138***

Dear Ms. Dortch:

The members of the NW U.S. 33 Corridor Council of Governments (COG/The Beta District), comprised of the City of Dublin, Ohio, the City of Marysville, Ohio, Union County, Ohio, and the Marysville-Union County Port Authority, urge the FCC to reconsider reducing the spectrum available for vehicle to everything (“V2X”) communication technologies in the United States, and in particular Ohio, where tens of millions of dollars have been invested in advancing connected and automated technology to allow real world testing of technology that will save lives.

More than \$105 million of private/public investments have already been made along the NW U.S. 33 Smart Corridor. This includes the creation of a 432-strand fiber optic system along a heavily travelled limited access highway (US33) connected to 91 small towers operating radios using DSRC technology and programmed to use the full 5.9 GHz spectrum. Global companies like Honda, DENSO, Wind River, Panasonic, Hyundai-Kia, and others are making substantial financial commitments to test their vehicles and technology along the NW U.S. 33 Smart Corridor toward the goal of saving lives.

The Commission has pointed out that DSRC technology has been slow to develop, but here is a system, ready to operate, with significant investment, that is having the proverbial rug pulled out from under it, just as it is to go operational. The adoption of the Commission’s Draft Notice of Proposed Rule Making in ET Docket No.19-138 would significantly delay the research into lifesaving and valuable safety technology that the COG and its partners are creating.

We urge the FCC to not reduce the full spectrum of 5.9 GHz for V2X in the United States as this will be detrimental to our efforts to build upon and fully realize the effort of a significant investment by local and state government, federal government and many private sector partners. Reducing this spectrum may significantly affect the efficacy of current and future applications of vehicle safety technologies. The Board of the NW U.S. 33 Corridor Council of Governments strongly supports the position that the 5.9 GHz spectrum should continue to be preserved for transportation safety technology.

Sincerely,

*Gregory J. Dunn*

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